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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

BROOKE McLAUGHLIN,

Plaintiff,

v.

UNITED STATES OF AMERICA,

Defendant.

No. C-04-0960 RS
STIPULATION TO CONTINUE CERTAIN
PRETRIAL DEADLINES, AND
~~[PROPOSED]~~ ORDER

IT IS HEREBY STIPULATED AND AGREED by and between the parties, by and through their respective undersigned attorneys, as follows:

Prior to the previous deadline for disclosure of experts, plaintiff's counsel contacted defendant's counsel to ask for an extension of time for completion of an expert report. Plaintiff's counsel offered to likewise extend defendant's deadline. Defendant's counsel agreed. The extension for defendant's expert disclosure is longer than plaintiff's due to defendant's counsel's upcoming prepaid vacation. Other deadlines were extended accordingly, but this request for extended deadlines does not impact the dates for filing pretrial statements, the pretrial conference, or the trial of this case.

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Accordingly, the parties request the following changes to the pretrial schedule:

Event	Previous Date	Requested Date
Plaintiff's Expert Disclosure and Reports re liability	June 9, 2006	June 23, 2006
Defendant's Expert Disclosure and Reports re liability	June 23, 2006	July 18, 2006
Completion of all fact and expert discover re liability	August 4, 2006	August 18, 2006
Last day to hear dispositive motions	September 20, 2006	September 27, 2006

IT IS SO STIPULATED.

Respectfully submitted,

THE CARTWRIGHT LAW FIRM, INC.

KEVIN V. RYAN
United States Attorney

/s/ Gary Loftis (for)
Robert E. Cartwright, Jr.

/s/ Claire T. Cormier
Claire T. Cormier
Assistant United States Attorney

Dated: June 15, 2006

Dated: June 15, 2006

ORDER

PURSUANT TO STIPULATION AND GOOD CAUSE APPEARING, IT IS SO ORDERED.

Date: 6/15/06


Hon. RICHARD SEEBORG
United States Magistrate Judge